

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
CASE NUMBER 08-CV-1722

GD DEAL HOLDINGS, LLC

PLAINTIFF

v.

SURINDER MULTANI, et al.

DEFENDANTS

**MOTION FOR DEFAULT JUDGMENT AND  
ENTRY OF CHARGING ORDER AGAINST  
JUDGMENT DEBTOR'S INTEREST IN ABBE CAPITAL AND LEASING, LLC**

Comes now the Plaintiff, GD Deal Holdings, LLC ("GD Deal Holdings"), by and through counsel, and, pursuant to FED. R. CIV. P. 54, FED. R. CIV. P. 69, and 805 ILCS 180/30-20, for its Motion for Default Judgment and Entry of Charging Order Against Judgment Debtor's Interest in ABBE Capital and Leasing, LLC ("ABBE Capital and Leasing"), states as follows:

1. On May 11, 2007, the United States District Court for the Western District of Kentucky granted a judgment to GD Deal Holdings against Surinder Multani for the recovery of \$10,048,295.12 with interest thereon at the judgment rate of 4.9% per annum from the date of judgment until paid.

2. On September 4, 2007, GD Deal Holdings registered the judgment in the United States District Court for the Northern District of Illinois, Case Number 1:07-cv-04965.

3. GD Deal Holdings is informed, and on the basis of such information and belief alleges, that Surinder Multani is a member of ABBE Capital and Leasing. A copy of a printout from the Illinois Secretary of State's website demonstrating that Surinder Multani is the registered agent for service of process for ABBE Capital and Leasing is attached hereto as "Exhibit A".

4. ABBE Capital and Leasing was served with process on April 11, 2008, and has failed to file responsive pleadings herein within twenty (20) days thereafter, said Defendant being in

default. A copy of an Affidavit of Service on ABBE Capital and Leasing is attached hereto as "Exhibit B".

5. GD Deal Holdings is entitled, under FED. R. CIV. P. 69 and 805 ILCS 180/30-20, to a charging order against the interest of Surinder Multani in ABBE Capital and Leasing.

6. The instant Motion is based on the Affidavit of counsel for GD Deal Holdings, attached hereto as "Exhibit C", and all the pleadings, records and papers on file in this action.

WHEREFORE, the Plaintiff, GD Deal Holdings, LLC, requests:

1. An Order requiring ABBE Capital and Leasing to produce a copy of all agreements concerning Surinder Multani's interest and the interest of other members in ABBE Capital and Leasing, together with evidence showing the interest of Surinder Multani in the income of ABBE Capital and Leasing;

2. A charging order against Surinder Multani's interest in ABBE Capital and Leasing or any other entity or joint venture in which Surinder Multani has an interest; and

3. Such further relief, at law or in equity, that the Court deems just and proper.

This day, July 23, 2008.

THOMAS M. FALKENBERG  
WILLIAMS MONTGOMERY & JOHN LTD.  
20 North Wacker Drive, Suite 2100  
Chicago, Illinois 60606-3094  
Telephone: (312) 443-3200

-and-

HARNED, BACHERT & DENTON, LLP  
324 East Tenth Avenue  
Post Office Box 1270  
Bowling Green, Kentucky 42102-1270  
Telephone: (270) 782-3938

/s/ Scott A. Bachert  
SCOTT A. BACHERT

**CERTIFICATION:**

This is to certify that a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court this day, July 23, 2008, by using the CM/ECF system, which will send a notice of electronic filing to the following:

Hon. Lucia Nale  
Hon. Diane Renae Sabol  
Hon. Nicole J. Highland  
MAYER BROWN LLP  
71 South Wacker Drive  
Chicago, Illinois 630606-4637

Hon. Robert T. Kuehl  
WELTMAN, WEINBERG & REIS Co., L.P.A.  
180 N. LaSalle Street, Suite 2400  
Chicago, Illinois 60601

This is to certify that a true and correct copy of the foregoing document was this day, July 23, 2008, placed in the US Mail, postage prepaid, addressed to the following:

Hon. Leroy Simms  
6061 Savoy Drive  
Houston, Texas 77036

Sapphire Supply, LLC  
c/o: Surinder Multani, Registered Agent  
2015 S. Arlington Hts. Rd. #120  
Arlington Heights, Illinois 60005

Hon. James O. Stola  
3701 West Fullerton Avenue  
Chicago, Illinois 60647

JGG Investments, LLC  
c/o: Kishor Shah, Registered Agent  
5 Whippoorwill Court  
Roselle, Illinois 60172

Surinder Multani  
302 Midwest Club  
Oak Brook, Illinois 60523

ABBE Capital and Leasing, LLC  
c/o: Surinder Multani, Registered Agent  
2015 S. Arlington Hts. Rd. #120  
Arlington Heights, Illinois 60005

Safanpreet Multani  
302 Midwest Club  
Oak Brook, Illinois 60523

ABBE Management Group, LLC  
c/o: Robert S. Luce, Registered Agent  
399 Quentin Rd. Ste. A  
Palatine, Illinois 60067

Surinder Multani  
24 Bright Ridge Drive  
Schaumburg, Illinois 60194

Babaji PS, LLC  
c/o: Narendra Bhalla, Registered Agent  
1718 Fry Road, Suite 415  
Houston, Texas 77084

Safanpreet Multani  
24 Bright Ridge Drive  
Schaumburg, Illinois 60194

ABBE Properties, LLC  
c/o: Surinder Multani, Registered Agent  
2015 S. Arlington Hts. Rd. #120  
Arlington Heights, Illinois 60005

Capital Access & Investments, LLC  
c/o: Narendra Bhalla, Registered Agent  
1718 Fry Road, Suite 415  
Houston, Texas 77084

G & S Portage, Inc.  
c/o: Ajai Agnihotri, Registered Agent  
1856 Samuelson Road  
Portage, Indiana 46368

/s/ Scott A. Bachert  
SCOTT A. BACHERT

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## LLC FILE DETAIL REPORT

Entity Name	ABBE CAPITAL AND LEASING, LLC	File Number	00919772
Status	NGS	On	05/01/2008
Entity Type	LLC	Type of LLC	Domestic
File Date	05/15/2003	Jurisdiction	IL
Agent Name	SURINDER S. MULTANI	Agent Change Date	05/15/2003
Agent Street Address	2015 S ARLINGTON HTS RD #120	Principal Office	2015 S ARLINGTON HTS RD #120 ARLINGTON HEIGHTS 60005
Agent City	ARLINGTON HEIGHTS	Management Type	MBR
Agent Zip	60005	Dissolution Date	PERPETUAL
Annual Report Filing Date	00/00/0000	For Year	2008
Series Name	NOT AUTHORIZED TO ESTABLISH SERIES		

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IN THE UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS

GD Deal Holdings, LLC

vs. Surinder Multani, et al.

Case Number 08 CV 1722

AFFIDAVIT OF SERVICE

I, Ronald Steffens, being first duly sworn on oath deposes and states that I am over the age of 18 years and not a party to this action, and on the 11 day of April, 2008, at 08:15 PM at 24 Bright Ridge, Schaumburg, IL 60194, did serve the following document(s):

**Summons and Complaint**

Upon: **Abbe Capital and Leasing, LLC**

By:  Personally serving to: Surinder Multani

leaving copies at the usual place of abode with:

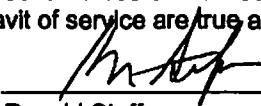
a member of the household 13 years or upwards and informed that person of the contents thereof

by mailing copies of said document(s) in a sealed envelope with postage fully prepaid to the defendant:  
at 24 Bright Ridge, Schaumburg, IL 60194 on

Description:	Sex	Male	Race	Middle Eastern	Approximate Age	56
	Height	5'10	Weight	160	Hair Color	Black

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this affidavit of service are true and correct.

Further the Affiant Sayeth Naught:

  
Ronald Steffens  
United Processing, Inc.  
55 West Wacker Drive, 9th Floor  
Chicago, IL 60601  
IL License #117-001101

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
CASE NUMBER 08-CV-1722

GD DEAL HOLDINGS, LLC

PLAINTIFF

v.

SURINDER MULTANI, et al.

DEFENDANTS

**AFFIDAVIT OF SCOTT A. BACHERT**

Scott A. Bachert, being sworn, deposes and says:

1. He is attorney for GD Deal Holdings, LLC, Plaintiff and judgment creditor in the above-entitled action, and makes this Affidavit in support of Plaintiff's foregoing Motion for Default Judgment and Entry of Charging Order Against Judgment Debtor's Interest in ABBE Capital and Leasing, LLC.

2. On May 11, 2007, the United States District Court for the Western District of Kentucky granted a judgment to GD Deal Holdings against Surinder Multani for the recovery of \$10,048,295.12 with interest thereon at the judgment rate of 4.9% per annum from the date of judgment until paid.

3. On September 4, 2007, GD Deal Holdings registered the judgment in the United States District Court for the Northern District of Illinois, Case Number 1:07-cv-04965.

4. The judgment remains outstanding and unsatisfied.

5. Affiant is informed and believes, and on that basis alleges, that Surinder Multani is a member of ABBE Capital and Leasing, LLC and the interest of Surinder Multani may properly be charged with the unpaid judgment in this action.

6. ABBE Capital and Leasing, LLC was served with process on April 11, 2008.

7. ABBE Capital and Leasing, LLC has failed to file responsive pleadings herein.

8. Affiant has received no pleadings or papers from ABBE Capital and Leasing, LLC.

This the 23<sup>rd</sup> day of July, 2008.

  
SCOTT A. BACHERT

COMMONWEALTH OF KENTUCKY )

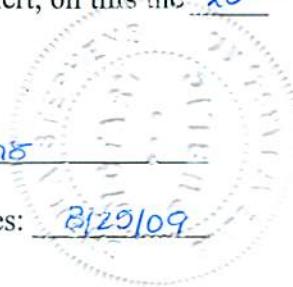
)

COUNTY OF WARREN )

)

Subscribed, sworn to and acknowledged before me by Scott A. Bachert, on this the 23<sup>rd</sup> day of July, 2008.

Sheila Stephens  
NOTARY PUBLIC  
My Commission Expires: 8/29/09



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
CASE NUMBER 08-CV-1722

GD DEAL HOLDINGS, LLC

PLAINTIFF

DEFAULT JUDGMENT AS AGAINST ABBE CAPITAL AND LEASING, LLC  
vs. AND ORDER ENTERING CHARGING ORDER

SURINDER MULTANI, et al.

DEFENDANTS

\*\*\* \* \* \*

This matter having come before the Court on GD Deal Holdings, LLC's Motion for Default Judgment and Entry of Charging Order Against Judgment Debtor's Interest in ABBE Capital and Leasing, LLC, the Court finds as follows:

1. On May 11, 2007, the United States District Court for the Western District of Kentucky granted a judgment to GD Deal Holdings against Surinder Multani for the recovery of \$10,048,295.12 with interest thereon at the judgment rate.
2. On September 4, 2007, GD Deal Holdings registered the judgment in the United States District Court for the Northern District of Illinois, Case Number 1:07-cv-04965.
3. The judgment has not been satisfied.
4. GD Deal Holdings, LLC is entitled as a matter of right under 805 ILCS 180/30-20 to a charging order against any interest of Surinder Multani in a limited liability company. There is no just reason for delay in entry of a charging order.
5. Surinder Multani is a member of ABBE Capital and Leasing, LLC.
6. The records on file with the Illinois Secretary of State demonstrate that Surinder Multani serves as ABBE Capital and Leasing, LLC's registered agent.
7. ABBE Capital and Leasing, LLC was served with process and a copy of the Complaint on April 11, 2008 and has failed to file responsive pleadings; therefore, being in default.

THEREFORE, IT IS ORDERED that the Plaintiff's Motion for Default Judgment is GRANTED.

IT IS FURTHER ORDERED by the Court that the interest of Surinder Multani as a member of ABBE Capital and Leasing, LLC be and is hereby subjected to an encumbrance and charging order in favor of and for the benefit of GD Deal Holdings, LLC.

IT IS FURTHER ORDERED by the Court that ABBE Capital and Leasing, LLC pay over to GD Deal Holdings, LLC such amounts as may from time to time become payable or distributable to Surinder Multani by reason of his interest in ABBE Capital and Leasing, LLC.

IT IS FURTHER ORDERED by the Court that Surinder Multani pay to GD Deal Holdings, LLC such amounts as may from time to time become payable or distributable to Surinder Multani by reason of his interest in ABBE Capital and Leasing, LLC.

IT IS FURTHER ORDERED by the Court that ABBE Capital and Leasing, LLC produce, within fifteen (15) days of the date of this Order, a copy of all operating agreements for ABBE Capital and Leasing, LLC and/or any other agreement controlling the interest of Surinder Multani, with such documents to be provided to GD Deal Holdings, LLC's attorney, together with evidence showing the value of the capital and/or income attributable to the interest of Surinder Multani in ABBE Capital and Leasing, LLC and copies of any and all tax returns filed during the last three (3) years on behalf of ABBE Capital and Leasing, LLC.

IT IS FURTHER ORDERED by the Court that ABBE Capital and Leasing, LLC file with the Clerk of this Court, within fifteen (15) days of the date of this Order, a sworn statement reporting to the Court all amounts distributable or payable to Surinder Multani at the time of this Order. In such sworn statement, ABBE Capital and Leasing, LLC shall state the value at the time of entry of this

Order of both the capital and income account attributable to Surinder Multani's interest in ABBE Capital and Leasing, LLC.

Jurisdiction is retained for such further orders and proceedings as may be necessary.

DATED, this the \_\_\_\_\_ day of \_\_\_\_\_, 2008.

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JUDGE, UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

Tendered by:

THOMAS M. FALKENBERG  
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-and-

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324 East Tenth Avenue  
Post Office Box 1270  
Bowling Green, Kentucky 42102-1270  
Telephone: (270) 782-3938

/s/ Scott A. Bachert  
SCOTT A. BACHERT